

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, et al. individually and on)	
behalf of all others similarly situated,)	
)	Case No. 1:22-cv-000125
<i>Plaintiffs,</i>)	
)	Hon. Matthew F. Kennelly
v.)	
)	
BROWN UNIVERSITY, et. al,)	
)	
<i>Defendants.</i>)	

**VANDERBILT DOE STUDENTS 1-42 MOTION FOR PROTECTIVE ORDER AND
ADDITIONAL TIME TO SUBMIT OBJECTION LETTERS**

Vanderbilt Doe Students 1-42 (the “Students”), by and through undersigned counsel, move this court for a protective order providing that objection letters sent to the Court by the Students in response to the Family Educational Rights and Privacy Act (“FERPA”) Notices that Vanderbilt University (“Vanderbilt”) sent to the students on October 19 and 20, 2023 be reviewed *in camera* without docketing the letters. To the extent the Court wants to provide access to the letters to any party, the Students ask the Court to permit them to (1) redact personally identifiable information (including their names) from the letters before they are provided to any counsel and (2) marked Attorneys’ Eyes Only pursuant to the Amended Confidentiality Order entered on July 28, 2023 (Dkt. No. 416-1). The Students additionally respectfully move this Court for a modest extension of time of fourteen (14) days after a ruling on this motion to submit the objection letters to the Court. The grounds for this motion are set forth in the Students’ Memorandum in Support of Motion for Protective Order and Additional Time to Submit Objection Letters filed concurrently herewith.

Date: October 29, 2023

Respectfully Submitted,

/s/ Sarah K. Wake

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Attorneys for Vanderbilt Doe Students 1-44

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 29, 2023, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all attorneys of record. I also sent a copy of the foregoing to counsel for the parties via email.

/s/ Sarah K. Wake _____
Sarah K. Wake